



July 24, 2023

## MEMO ENDORSED

**VIA ECF**

The Honorable Victoria Reznik, U.S.M.J.  
U.S. District Court for the Southern District of New York  
300 Quarropas Street, Courtroom 420  
White Plains, NY 10601-4062

**Re: Rand v. The Travelers Indemnity Company, Case No. 7:21-cv-10744-VB-VR**

Dear Judge Reznik:

We represent Plaintiff and request the Court allow Plaintiff to temporarily file under seal Plaintiff's Memorandum of Law in Opposition to Defendant's Motion to Quash (the "Response Brief") and Exhibit A. Plaintiff's Response Brief quotes from Traveler's unredacted brief, cites to several documents the Court previously sealed and/or Travelers moved to seal, as well as to Travelers' March 17, 2023 Responses and Objections to Plaintiff's First Set of Interrogatories (attached to the Response Brief as Exhibit A), which has been designed by Travelers as "Confidential" pursuant to the Protective Order.<sup>1</sup>

On July 14, 2023, Travelers filed a motion to seal. ECF No. 71. On July 19, the Court issued a Sealing Order which sealed documents filed in conjunction with the Parties' prior pre-motion conference briefing. ECF No. 76. Travelers has until August 4, 2023, to file a renewed motion proposing more narrowly tailored redactions to certain exhibits. *Id.* Since these are Travelers' documents, Plaintiff takes no position on the validity of Travelers' designations and/or reasonings to seal. Plaintiff asks the Court to allow its Response Brief and Exhibit A to be temporarily sealed until the Court rules on the July 14 motion and Travelers provides the necessary redactions. Plaintiff will file a redacted Response Brief and the unredacted version will include yellow highlighting of those sections the Court should temporarily seal.

Plaintiff's request is  
GRANTED.

Respectfully submitted,

/s/ Christian Levis  
Christian Levis

/s/ Thomas J. McKenna  
Thomas J. McKenna

Accordingly, the Clerk  
of Court is directed to  
temporarily maintain  
ECF Nos. 78 and 78-1  
under seal pending a  
future order from the  
Court.

cc: All Counsel of Record (*via* ECF)

SO ORDERED.  
Dated: 7/25/23

Hon. Victoria Reznik, U.S.M.J.

<sup>1</sup> Plaintiff Response Brief quotes from the following documents: ECF Nos. 63-3 (57-4) (Exhibit 4); 63-6 (57-7) (Exhibit 7); 63-7 (57-8) (Exhibit 8); 63-8 (57-9) (Exhibit 9); 63-9 (57-10) (Exhibit 10); 63-10 (57-11) (Exhibit 11); 63-11 (57-12) (Exhibit 12); 63-12 (57-13) (Exhibit 13); 74-1 (Exhibit D); 74-3 (Exhibit F). Exhibits 4, 7-10 were previously sealed by the Court and Exhibits D, F remaining pending. While the Court denied Travelers' motion to seal Exhibits 11-13, Plaintiff cannot publicly cite them since Travelers has until August 4, 2023, to file a renewed motion.